

DIVISION OF SHELLFISH SANITATION

109 Governor Street, Room 614-B Richmond, VA 23219 Ph: 804-864-7480 Fax: 804-864-7481

JAMES RIVER: NEWPORT NEWS POINT TO DEEP CREEK Growing Area #57 Cities of Hampton and Newport News Shoreline Sanitary Survey

Date: March 4, 2004

Survey Period: December 10, 2003 - January 20, 2004

Total Number of Properties: 73

Surveyed By: S. Naylor, T. Fearington, and J. Merritt

SECTION A: GENERAL

This survey area extends from Reference Point 57 at Newport News Point to Reference Point 58 at Blunt Point, including the James River shoreline between these points, Newport News Creek (Small Boat Harbor), Newmarket Creek, Government Ditch, Lake Maury, Kettle Pond, and all of their tributaries.

The topography is characterized by an immediate rise in elevation along the shoreline to moderate heights and then leveling out to form a broad plateau. In the southeastern portion, the shoreline rises abruptly from 10' to 15', leveling out at approximately 20'. The relief increases in the upstream portions, with shoreline elevations reaching 25' and plateau-ing at 35' to 40'.

The population is very dense throughout the survey area. The area economy depends upon general metropolitan commerce, seafood, tourism, various military installations, and large industrial operations including Newport News Shipbuilding; Dominion Terminal Associates; Davis Boat Works; Kinder Morgan Pier IX Terminal (coal storage and shipment); and Koch Materials Company (liquid asphalt distribution terminal).

Meteorological data indicated that 3.42" of rain fell during the survey period. A monthly breakdown follows:

December 10-31, 2003 2.78" January 1-20, 2004 0.64"

Boating activity involves a full range of vessel types, sizes, and associated support activities. A number of seafood processing facilities associated with the Newport News Seafood Industrial Park are located within the boundaries of this survey. Seafood products landed and processed include scallops, whelks, shellstock clams, and crabs. Of the 6 seafood processing establishments located within the complex, only two, Casey Seafood VA19-C and Old Point Packing VA1176-SP, have direct permitted discharges to shellfish waters.



Most of the area is serviced by a public sewerage system operated by the Hampton Roads Sanitation Commission (HRSD) and is connected to either the Boat Harbor Sewage Treatment facility, which discharges into the James River at Newport News Point; or the James River Sewage Treatment facility which discharges into the Warwick River. The Monitor-Merrimac Bridge Tunnel service island on the Suffolk side was originally constructed with a package sewage treatment facility. However, difficulties in operating this plant efficiently resulted in its closure during the summer of 1995. Sanitary wastes generated at this location are held in a 1500 gallon tank with a highwater alarm, and are pumped at least three times a week by Zartis Septic Company. Wastes generated from the north service island go directly to the public sewerage system in Newport News. The James River Bridge tender station contained an electric incinerating toilet for treatment of human waste. However, now the sanitary wastes are collected, along with gray water generated, and stored in a 500 gallon holding tank. This tank is pumped once every three weeks and the collected waste hauled to HRSD for treatment.

The waters encompassed within the boundaries of survey area 57 lay along the northwest shore of the Port of Hampton Roads and are subjected to heavy merchant, commercial, military and private marine vessel traffic. These waters are subject to possible contamination from illegal vessel discharges, accidental spills, or sinkings. Oil spill retention and recovery equipment is available at all significant port facilities.

The current restrictions on shellfish harvesting are Condemned Shellfish Area #7, Hampton Roads, revised 1 May 1997, and Condemned Shellfish Area #34, Warwick and James Rivers, revised 1 October 1993. A Copy of the current condemnation notices and maps are attached to the end of this survey report.

Copies of the last inspections from all permitted storm water and industrial waste outfalls can be obtained from the Department of Environmental Quality, Tidewater Regional Office.

Information in this report is gathered by and primarily for use of the Division of Shellfish Sanitation, Virginia Department of Health, in order to fulfill its responsibilities of shellfish growing area supervision and classification. However, the data are made available to various agencies participating in shellfish program coordinated activities or other interested parties.

Report copies are provided to the local health department for corrective action of deficiencies listed on the summary page in Sections B.2. and B.3. and the Department of Environmental Quality for possible action at properties listed on the summary page in Sections B.1., C.1. and C.2. The Division of Soil and Water Conservation is provided information on possible sources of animal pollution found in Section E.

This report lists only those properties which have a sanitary deficiency or have other environmental significance. "DIRECT" indicates that the significant activity or deficiency has a direct impact on shellfish waters. Individual field forms with full information on properties listed in this report are on file in the Richmond Office of the Division of Shellfish Sanitation and are available for reference until superseded by a subsequent resurvey of the area.

SECTION B: SEWAGE POLLUTION SOURCES

SEWAGE TREATMENT FACILITIES

12. **DIRECT** – Hampton Roads Sanitation District, Small Boat Harbor Sewage Treatment Facility, Newport News, 23607. Permit # VA0081256. Treatments consist of primary and secondary sedimentation, activated sludge and flotation thickening tanks, chlorination/dechlorination and phosphorous removal. Effluent is discharged to the James River at Newport News Point. The most recent OWP/SWCB inspection report is attached.

ON-SITE SEWAGE DEFICIENCIES

24. CONTRIBUTES POLLUTION – Occupant: Josh Miller, 15 Mary Ann Drive, Hampton 23666. Owner: Jeffery & Stephanie Montz (managed by Greg Garrett Realty). Dwelling – Blue vinyl siding 2-story with red trim. 4 persons. Effluent erupting from septic tank onto ground surface. Sanitary Notice issued 12-11-03 to field #13.

POTENTIAL POLLUTION

23. Daniel D. Kompradith, 714 Todd's Lane, Hampton 23666. Dwelling – brick 1½ story with white trim and detached carport and garage. 2 persons. Sewage odor was observed in backyard near septic tank. The lid of the tank was covered tightly with carpet, so it could not be inspected for cracks.

SECTION C: NONSEWAGE WASTE SITES

INDUSTRIAL WASTES

- DIRECT Occupant: Davis Boat Works, Inc., 99 Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park, 101 Jefferson Avenue, Newport News 23607. Business small boat repair yard. Approximately 100 employees. Sandblasting and spray painting operations within 20' of Small Boat Harbor at 5' elevation. Two 9,900 gallon, three 3,600 gallon, and one 500 gallon above ground storage tanks used for storing diesel fuel, oil, and kerosene with steel pan containment. Has VPDES Permit #VA0089664 from Department of Environmental Quality.
- 4. **DIRECT** Occupant: Papco Oil Company, 407 Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park, 101 Jefferson Avenue, Newport News 23607. Business wholesale fuel retailer. 15 employees. Two 500,000 gal., two 200, 000 gal., two 160,000 gal., two 3,000 gal., one 6,000 gal., and two 1,000 gal. above ground storage tanks used for storing diesel fuel, kerosene, gasoline and lube oil. All tanks are contained within a concrete block retention wall, located adjacent to Small Boat Harbor.

- 5. Occupant: Venture Dynamics (subsidiary of Davis Boat Works), 601A Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park, 101 Jefferson Avenue, Newport News 23607. Business small boat repair yard. 18 employees. Light to medium steel and engine repair on boats. Heavy metals and hydrocarbons could potentially be discharged in storm water runoff.
- Occupant: Omni Marine Engine Repair, 601D Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park, 101 Jefferson Avenue, Newport News 23607. Business – Machine shop. 2 employees. Heavy metals and hydrocarbons could potentially be discharged in storm water runoff.
- 8. **DIRECT** Occupant: Casey's Seafood, 807 Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park, 101 Jefferson Avenue, Newport News 23607. Business crabmeat processing plant (VA-19C). Approximately 15 employees. Pressurized retort steam condensate drains to Small Boat Harbor. Has general seafood processing permit #VAG523014 from the Department of Environmental Quality.
- DIRECT Occupant: Old Point Packing, Company, 817 Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park, 101 Jefferson Avenue, Newport News 23607. Business – seafood processor (i.e. scallops, whelk, and fin fish). 20 employees. Floor drain wastes from general seafood processing. Has permit #s VAG523015 and VAG523016 from the Department of Environmental Quality.
- 11. DIRECT Occupant: Monitor-Merrimac Bridge Tunnel, Newport News 23607. Owner: Virginia Department of Transportation, 1221 East Broad Street, Richmond 23219. Public tunnel maintenance facility. 108 employees. Storm water in tunnels are collected with a sump pump and pumped to holding/sedimentation tanks and outfalls (#001, #002). Has VPDES permit #VA0080179 from the Department of Environmental Quality.
- 13. DIRECT Occupant: Koch Materials Company, Inc., 801 Terminal Avenue, Newport News 23607. Owner: Koch Industries, P.O. Box 2256, Wichita, Kansas 67201. Business liquid asphalt distribution terminal. 11 employees. 41 above ground tanks or various sizes, totaling 23 million gallons storage capacity contain asphalt, asphalt emulsions, and associated chemicals (organic solvents) surrounded by earthen concrete and asphalt retention berms. Storm water is collected in retention ponds and pumped through an oil/water separator to two outfalls (#001, #002). Has VPDES permit #VA0055832 from the Department of Environmental Quality.

- DIRECT Location: Pier XI, Harbor Road, Newport News 23607. Owner: Dominion Terminal Associates, P.O. Box 967A, Newport News 23607. Business bulk coal distribution terminal. 59 employees. Closed cycle water spraying used on facility to keep coal dust to a minimum. Onshore facilities and pier are bermed to prevent runoff from entering the James River. Runoff is collected in retention ponds and reused. Has VPDES permit #VA0057576 from the Department of Environmental Quality.
- 16. DIRECT Location: Pier IX, Harbor Road, Newport News 23607. Occupant: Kinder Morgan Bulk Terminals, Inc., P.O. Box 38, Newport News 23607. Owner: Kinder Morgan, Inc., Houston Texas. Business coal distribution terminal. Approximately 50 employees. Onshore facilities are bermed to retain runoff. Runoff is collected, passed through an oil/water separator, sent to retention ponds and reused in coal dust suppression spraying system. There is one outfall (#001) from the retention pond and two outfalls (#002, #003) from street drains to the James River. Has VPDES permit #VA0057142 from the Department of Environmental Quality.
- 17. Occupant: Newport News Marine Terminals, 25th Street and Warwick Boulevard, Newport News 23607. Owner: Virginia Port Authority, 600 World Trade Center, Norfolk 23510. Business bulk and containerized cargo loading. Approximately 100 employees. Containers of unknown contents loaded and unloaded at this 140 acre location. Has VPDES permit #VAR550062 from the Department of Environmental Quality for storm water runoff.
- 19. **DIRECT** – Newport News Shipbuilding and Dry Dock Company, 4101 Washington Avenue, Newport News 23607. Business - shipbuilding, ship overhauls, refits, and repairs. Approximately 18,000 employees. Capabilities include nuclear vessel construction, repair and refueling, metals founding, fabrication, tooling, welding, sandblasting, and painting. Over 200 buildings, 6 piers, 2 shipways, 2 outfitting berths, 8 dry docks (1 floating) and 2 floating dormitories, all located between 31st and 70th Streets. There are 37 above ground storage tanks with capacities in excess of 500 gallons located on the facility for the storage of fuels, recovered oil, and oily wastewater. Has VPDES permit #VA0004804 from the Department of Environmental Quality. This permit covers a total of 184 outfalls, which are characterized variously as noncontact cooling water, storm water drainage, air conditioning, condensate, cooling water, drinking fountain drainage, neutralizer, groundwater and gate leakage, dry dock dewatering & drainage, boiler regeneration water, steam condensate.

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SECTION D: BOATING ACTIVITY

MARINAS

20. Leeward Marina, 7499 River Road, Newport News 23607. Owner: City of Newport News, 2400 Washington Street, Newport News 23607. Marine – public marina. 7 employees. 200 slips/moorings. Present at time of survey were 70 pleasure boats under 26', 40 pleasure boats 26'-39', and 10 pleasure boats over 40'. Boating services provided are fuel, water, and electricity at slips. Sanitary facilities provided are 3 commodes, 2 urinals, 4 lavatories, and 2 showers for men; and 5 commodes, 4 lavatories, and 2 showers for women. Sewage disposal is by public sewer to the Hampton Roads Sanitation District. Boat holding tank pump-out facilities consist of 1½" suction line with waste pumped to public sewer.

OTHER PLACES WHERE BOATS ARE MOORED

- 1. City of Newport News Seafood Industrial Park, 101 Jefferson Avenue, Newport News 23607. Owner: City of Newport News, 2400 Washington Avenue, Newport News 23607. 1 employee. Marine - developed industrial park providing boat harborage and wharfage for use by marine and seafood businesses surrounding Small Boat Harbor. The facility includes all of the property surrounding the Small Boat Harbor, and 2 large piers extending out 900' and 600'. The east side of the bulkhead is rented out to businesses, the first 100' of the west side is used for a loading platform and the remainder of the 1700' bulkhead is used by fishermen and small boats. The concrete Phase One pier is 20'x900'; the first 250' is leased to commercial trawlers, used for seafood offloading, and transient moorings; the remaining 650' is used for tugboat and fireboat mooring. The Tandum pier is 20'x600'; the entire east side is leased to McAlister Towing of Virginia for moorings, and the west side is used for lay vessel tugboats and trawler moorings. The Industrial Park provides only mooring and berthing as a direct boating service, however, boat fueling, water, electricity, marine supply, boat (hull and engine) repair, marine salvage, boat hoist, catch unloading and icing are provided by tenants of the park. Sanitary facilities are provided only through the renting tenants within 100' along the bulkheads of the Harbor. Sewage disposal is by public sewer to Hampton Roads Sanitation District. The Industrial Park provides a holding tank pump-out station and ejection system for boats, however there is no dump station provided.
- Davis Boat Works, Inc., 99 Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park. Marine small boat repair yard. Approximately 100 employees. 1 slip/10 moorings. Present at time of survey were 6 work boats over 40'. Boating services provided are boat hoist and onshore repair yard. Sanitary facilities provided are 5 commodes, 3 urinals and 3 lavatories for men; 2 commodes and 2 lavatories for women. Sewage disposal is by public sewer to Hampton Roads Sanitation District. This facility no longer provides boat holding tank pump-out services or a dump station. This facility uses PetroChem, a licensed septic tank company when holding tanks on boats need to be pumped.

- 3. Location: 207 Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park. Marine provides mooring for commercial fishing vessels. No Contact. Unknown occupant and facilities at address. Present at time of survey were 2 boats over 90'. Unknown boating services and sanitary facilities provided.
- 4. Papco Oil Company, 407 Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park. Business wholesale fuel retailer. 15 employees. 0 slips/3 moorings. Present at time of survey was 1 work boat over 125'. The only boating service provided is fuel. There are no boat holding tank pump-out facilities provided at this location. Sewage disposal from sanitary facilities located on the property is by public sewer to HRSD.
- 5. Venture Dynamics (subsidiary of Davis Boat Works, Inc.), 601A Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park. Marine small boat repair yard. 18 employees. 400' of bulkhead used for mooring and 1 slip. No boats present at time of survey. The only boating service provided is repairs. Sanitary facilities provided are 1 commode and 1 lavatory. Sewage disposal is by public sewer to Hampton Roads Sanitation District. There are no boat holding tank pump-out or dump station facilities provided at this location.
- 7. Peabody, L.L.C., 675 Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park. Marine fin fish & scallop offloader and processor. 4 employees. Present at time of survey were 7 work boats over 60'. There are no boating services provided at this location. Sanitary facilities provided are 1 commode and 1 lavatory. Sewage disposal is by public sewer to Hampton Roads Sanitation District. There are no boat holding tank pump-out or dump station facilities provided at this location.
- 9. Old Point Packing Company, 817 Jefferson Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park. Marine seafood processor of scallops, whelk, and fin fish. 20 employees. 4 slips/10 moorings, this includes area on bulkhead formerly rented by Harbor Cruise, Inc. Present at time of survey were 10 work boats over 40'. There are no boating services provided at this location. Sanitary facilities are provided inside building, sewage disposal is by public sewer to Hampton Roads Sanitation District. There are no boat holding tank pump-out or dump station facilities provided at this location.
- 10. Chesapeake Bay Packing, L.L.C., 800 and 800B Terminal Avenue, Newport News 23607. Owner: City of Newport News Seafood Industrial Park. Marine seafood processor of scallops, whelk, and fin fish, provides mooring for commercial fishing fleet on adjacent bulkhead. 15-30 employees. Present at time of survey were 12 work boats over 50', bulkhead can accommodate up to 20 vessels depending on size. Sanitary facilities provided are 2 commodes and 2 hand-sinks; sewage disposal is by public sewer to Hampton Roads Sanitation District. Boating services provided are water and electricity. There are no boat holding tank pump-out or dump station facilities provided at this location.

- 13. Koch Materials Company, Inc., 801 Terminal Avenue, Newport News 23607.

 Owner: Koch Industries, P.O. Box 2256, Wichita Kansas, 67201. Business –

 Liquid asphalt distribution terminal. 11 employees. 1 tanker pier and 1 barge
 pier. There were no boats present at the time of survey. There are no boating
 services provided at this location. Sanitary facilities provided are 3 commodes,
 3 urinals, 2 lavatories, and 1 shower for men; and 1 commode and 1 lavatory
 for women. Sewage disposal is by public sewer to Hampton Roads Sanitation
 District. There are no boat holding tank pump-out or dump station facilities
 provided at this location.
- 14. Jerry O. Talton, Inc., 350 & 450 Harbor Road, Newport News 23607 (Pier XIV and Pier XV). Owner: CSX Real Properties. Marine Lay berthing for military ships (Sealift Command). 3 employees. 2 large piers (XIV & XV) with 6 moorings. There were 5 LSMR vessels present at time of survey. Boating services provide are water and electricity. Sewage disposal for the sanitary facilities located in the office trailer is by public sewer to HRSD. The sewage from the ships is pumped out by licensed septic tank pumping trucks and hauled away. There are no boat holding tank pump-out or dump station facilities provided at this location.
- 15. Dominion Terminal Associates, P.O. Box 967A, Newport News 23607. Location: Pier XI, Harbor Road, Newport News 23607. Business bulk coal distribution terminal. 59 employees. 2 moorings. There were no boats present at time of survey. The only boating service provided is water. Sanitary facilities provided are 15 commodes, 15 urinals, 8 lavatories, and 10 showers for men; and 5 commodes, 3 lavatories, and 1 shower for women. Sewage disposal is by public sewer to Hampton Roads Sanitation District. There are no boat holding tank pump-out or dump station facilities provided at this location.
- 16. Kinder Morgan Bulk Terminals, Inc., P.O. Box 38, Newport News 23607. Location: Pier IX, Harbor Road, Newport News 23607. Owner: Kinder Morgan, Inc., Houston Texas. Business coal distribution terminal. Approximately 50 employees. 2 slips/2 moorings. There were no boats present at time of survey. The only boating service provided is water. Sanitary facilities provided are 15 commodes, 15 urinals, 10 lavatories, and 10 showers for men; and 5 commodes, 3 lavatories, and 1 shower for women. Sewage disposal is by public sewer to Hampton Roads Sanitation District. There are no boat holding tank pump-out or dump station facilities provided at this location.
- Newport News Marine Terminals, 25th Street and Warwick Boulevard, Newport News 23607. Owner: Virginia Port Authority, 600 World Trade Center, Norfolk 23510. Business bulk and containerized cargo loading. Approximately 100 employees. 7 slips/moorings. There were no boats present at time of survey. Boating services provided are electricity, water and provisioning. Sanitary facilities provided are 12 commodes, 15 urinals, 8 lavatories, and 5 showers for men; and 5 commodes, 3 lavatories, and 1 shower for women. Sewage disposal is by public sewer to Hampton Roads Sanitation District.

- 18. Pier I Ready Reserve Fleet, End of 23rd Street, Newport News 23607. Owner: City of Newport News, 2400 Washington Street, Newport News 23607. Marine dockage for military supply vessels. 2 slips/moorings. There were 2 work boats over 40' present at time of survey. Boating services provide are water and electricity. There are no sanitary facilities and no boat holding tank pump-out facilities available at this location.
- 19. Newport News Shipbuilding and Dry Dock Company, 4101 Washington Avenue, Newport News 23607. Marine - Shipbuilding, ship overhauls, refits, and repairs. Approximately 18,000 employees and approximately 8,000 attached U.S. Naval personnel. Facility contains 6 piers, 2 shipways, 2 outfitting berths, 8 dry docks (1 floating), and 2 floating dormitories. Present at time of survey were 2 work boats 20', 5 work boats over 20', 2 tug boats, 1 security boat (35') and 6 ships in varying stages of construction or repair. Boating services provided are electricity, water, provisioning, dry docking, and ship repair (hull and engine). Sanitary facilities provided are 260 commodes, 355 urinals, 260 lavatories, 50 showers and 30 privies (portable toilets) for men; and 155 commodes, 105 lavatories and 40 showers for women. Has direct ship to shore sewer connections for ships berthed at this facility and floating dormitories. Sewage disposal is by public sewer to the Hampton Roads Sanitation District. Privies are pumped 3 times each week and the waste is treated at HRSD. There is no boat holding tank pump-out facility provided at this location.

UNDER SURVEILLANCE

21. Huntington Park Boat Launch, 5500 West Mercury Boulevard, Newport News 23607. Owner: City of Newport News, 2400 Washington Street, Newport News 23607. Marine – Municipal boat ramp and public beach. 2 boat in-out ramps. There were no boats present at time of survey. The parking lot can accommodate approximately 75 boat trailers. The only boating services provided are the in-out ramps. Sanitary facilities provided are 3 commodes, 2 urinals, 4 lavatories, and 1 shower for men; and 5 commodes, 4 lavatories, and 1 shower for women. Sewage disposal is by public sewer to HRSD. There are no boat holding tank pump-out facilities provided at this location.

SECTION E: CONTRIBUTES ANIMAL POLLUTION

22. William F. Burney, 14 Downer Lane, Hampton 23666. Dwelling – 1 story brick with white trim. Outbuildings include a detached garage, a chicken shed and a bird coop. No Contact. Present at time of survey were 2 sheep and 25 birds (assorted doves and chickens). All animals are confined to cages or pens. Waste disposal method is unknown.

SUMMARY

Area #57

James River: Newport News Point to Deep Creek

March 4, 2004

SECTION B: SEWAGE POLLUTION SOURCES

- 1. SEWAGE TREATMENT FACILITIES
 - 1 DIRECT # 12
 - 0 INDIRECT
 - 1 TOTAL
- 2. **ON-SITE SEWAGE DEFICIENCIES** Correction of deficiencies in this section is the responsibility of the local health department.
 - 0 CONTRIBUTES POLLUTION, DIRECT
 - 1 CONTRIBUTES POLLUTION, INDIRECT # 24
 - 0 CP (Kitchen or Laundry Wastes), DIRECT
 - 0 CP (Kitchen or Laundry Wastes), INDIRECT
 - 0 NO FACILITIES, DIRECT
 - 0 NO FACILITIES, INDIRECT
 - 1 TOTAL
- 3. **POTENTIAL POLLUTION** Periodic surveillance of these properties will be maintained to determine any status change.
 - 1 POTENTIAL POLLUTION # 23

SECTION C: NON-SEWAGE WASTE SITES

- 1. INDUSTRIAL WASTE SITES
 - 9 DIRECT # 2, 4, 8, 9, 11, 13, 15, 16, 19
 - 3 INDIRECT # 5, 6, 17
 - 12 TOTAL
- 2. SOLID WASTE DUMPSITES
 - 0 DIRECT
 - 0 INDIRECT
 - 0 TOTAL

SECTION D: BOATING ACTIVITY

- 1 MARINAS # 20
- 15 OTHER PLACES WHERE BOATS ARE MOORED # 1, 2, 3, 4, 5, 7, 9, 10,
- 13, 14, 15, 16, 17, 18, 19
 - 1 UNDER SURVIELLENCE # 21
 - 17 TOTAL

SECTION E: CONTRIBUTES ANIMAL POLLUTION

- 0 DIRECT
- 1 INDIRECT # 22
- 1 TOTAL

